

1 David C. Wakefield, Esq. Bar #: 185736
2 Lightning Law, APC
3 10620 Treena Street, Suite 230
4 San Diego, CA 92131
5 Telephone: 619.485.4300; Facsimile: 619.342.7755
E-mail: dcw@DMWakeLaw.com
Attorney for Plaintiffs

6 Jason M. Stone (SBN 299373)
7 STONE & SALLUS LLP
8 2235 Campus Dr.
9 El Segundo, CA 90245
10 Telephone: (310) 889-0233 Facsimile: (310) 889-0230
Email: jstone@stonesalluslaw.com
Attorneys for all Defendants

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 **UNITED AFRICAN-ASIAN**
15 **ABILITIES CLUB, ON BEHALF**
16 **OF ITSELF AND ITS**
17 **MEMBERS; ANNA MARIE**
18 **WIGGINS, An Individual, ON**
19 **BEHALF OF ROBERT AARON**
20 **MCKISSICK**

21 **Plaintiffs,**

22 **v.**

23 **ORA CALIFORNIA**
24 **PROPERTIES, LP; and DOES 1**
25 **THROUGH 10, Inclusive,**

26 **Defendants.**

Case#: 2:22-cv-07065-FLA-PVC

STIPULATION FOR DISMISSAL
WITH PREJUDICE OF ALL
DEFENDANTS AND
PLAINTIFFS' COMPLAINT IN
ITS ENTIRETY

[Fed. R. Civ. P. Rule 41(a)(2)]

1 IT IS HEREBY STIPULATED by and between the Plaintiffs UNITED
2 AFRICAN-ASIAN ABILITIES CLUB, ON BEHALF OF ITSELF AND ITS
3 MEMBERS; and ANNA MARIE WIGGINS, An Individual, on the one hand, and
4 Defendant ORA CALIFORNIA PROPERTIES, LP, on the other hand, by
5 themselves and/or through their respective attorneys of record, pursuant to Federal
6 Rules of Civil Procedure, Rule 41 (a)(1) and (2), that this Court enter a dismissal
7 with prejudice of all Defendants from Plaintiffs' Complaint. The parties herein
8 reached settlement of the present action. Each party shall bear their own respective
9 attorney fees and costs.

10 Since no Defendants shall remain in this action, Plaintiffs request that
11 Plaintiffs' Complaint be dismissed with prejudice in its entirety.

12
13 **IT IS SO STIPULATED.**

14
15 Dated: 04/22/2024

Lightning Law, APC

16
17 By: /S/ David C. Wakefield, Esq.
18 David C. Wakefield, Esq.
19 Attorney for Plaintiffs

20
21 Dated: 04/22/2024

STONE & SALLUS LLP

22
23 By: /S/ Jason M. Stone, Esq.
24 Jason M. Stone, Esq.
25 Attorney for Defendant

26
27 ///

SIGNATURE ATTESTATION

Pursuant to Civil L.R 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in this document's content and have authorized the filing of this document with the use of their electronic signature.

Dated: 04/22/2024

Lightning Law, APC

By: /S/ David C. Wakefield, Esq.
David C. Wakefield, Esq.
Attorney for Plaintiffs

///

///

///

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 10620 Trenea Street, Suite 230, San Diego, CA 92131.

On 04-22-2024, I served the document described below on all interested parties in the attached service list by the method indicated below:

1. JOINT STIPULATION FOR DISMISSAL WITH PREJUDICE OF ALL DEFENDANTS AND PLAINTIFFS' COMPLAINT IN ITS ENTIRETY

2. ORDER GRANTING DISMISSAL WITH PREJUDICE OF ALL DEFENDANTS AND PLAINTIFFS' COMPLAINT IN ITS ENTIRETY

 BY MAIL - I deposited such envelope in the mail at San Diego, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Diego, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

 BY PERSONAL SERVICE – I caused such envelope to be delivered by a process server employed by _____

 VIA FACSIMILE – I faxed said document, to the office(s) of the addressee(s) shown above, and the transmission was reported as complete and without error.

XXX **BY ECF ELECTRONIC TRANSMISSION** – I transmitted a PDF version of this document by electronic transmission to the party (s) identified on the attached service list using the court supported ECF e-mail to the address(s) indicated.

 BY OVERNIGHT DELIVERY – I deposited such envelope for collection

1 and delivery by the Federal Express with delivery fees paid or provided for in
2 accordance with ordinary business practices. I am “readily familiar” with the
3 firm’s practice of collection and processing packages for overnight delivery by
4 Federal Express. They are deposited with a facility regularly maintained by
Federal Express for receipt on the same day in the ordinary course of business.

5 _____ (State) I declare under penalty of perjury under the laws of the State of
6 California that the above is true and correct.

7 **XX** (Federal) I declare that I am employed in the office of a member of the
8 bar of this Court at whose direction the service was made.
9 At San Diego, California.

10 /s/ David C. Wakefield
11 David C. Wakefield

12 **SERVICE LIST**

13
14 Jason M. Stone (SBN 299373)
15 STONE & SALLUS LLP
16 2235 Campus Dr.
17 El Segundo, CA 90245
18 Telephone: (310) 889-0233 Facsimile: (310) 889-0230
19 Email: jstone@stonesalluslaw.com
20 Attorneys for all Defendants
21
22
23
24
25
26